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Mar 02, 2021

SEAN F. McAVOY, CLERK

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,

Plaintiff,

4:21-CR-6008-SMJ

## INDICTMENT

V.

Vio.: 21 U.S.C. §§ 841(a)(1),  
(b)(1)(A)(vi), 846

[REDACTED] and  
JERROD JUSTIN HALE

**Conspiracy to Distribute 400  
grams or more of Fentanyl  
(Count 1)**

Defendants.

21 U.S.C. § 841(a)(1),  
(b)(1)(B)(vi), 18 U.S.C. § 2  
Possession with the Intent to  
Distribute 40 Grams or more  
of Fentanyl  
(Count 2)

21 U.S.C. § 853  
Forfeiture Allegations

The Grand Jury charges:

## COUNT 1

Beginning on a date unknown, but by December 2020, and continuing until on or about March 2, 2021 in the Eastern District of Washington and elsewhere, the Defendants, [REDACTED] [REDACTED] and JERROD JUSTIN HALE, and other individuals, both known and unknown to the Grand

1 Jury, did knowingly and intentionally combine, conspire, confederate and agree  
2 together with each other to commit the following offense: distribution of 400  
3 grams or more of a mixture or substance containing a detectable amount of  
4 N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide (a/k/a Fentanyl), a  
5 Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1),  
6 (b)(1)(A)(vi), 846.

7  
8 **COUNT 2**

9 On or about December 13, 2020, in the Eastern District of Washington, the  
10 Defendant, [REDACTED] knowingly and intentionally possessed  
11 with intent to distribute 40 grams or more of a mixture or substance containing a  
12 detectable amount of N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propanamide  
13 (aka Fentanyl), a Schedule II controlled substance, in violation of 21 U.S.C.  
14 § 841(a)(1), (b)(1)(B)(vi).

15 **NOTICE OF CRIMINAL FORFEITURE ALLEGATIONS**

16 The allegations contained in this Indictment are hereby re-alleged and  
17 incorporated by reference for the purpose of alleging forfeitures.

18 Pursuant to 21 U.S.C. § 853, upon conviction of an offense of violation of 21  
19 U.S.C. §§ 841(a)(1), (b)(1)(A)(vi), (b)(1)(B)(vi), 846, as charged in this Indictment, the  
20 Defendants, [REDACTED] and JERROD JUSTIN  
21 HALE, shall forfeit to the United States of America, any property constituting, or  
22 derived from, any proceeds obtained, directly or indirectly, as the result of such offense  
23 and any property used or intended to be used, in any manner or part, to commit or to  
24 facilitate the commission of the offense.

25  
26 If any forfeitable property, as a result of any act or omission of the  
27 Defendants:

- 28
- a. cannot be located upon the exercise of due diligence;
  - b. has been transferred or sold to, or deposited with, a third party;
  - c. has been placed beyond the jurisdiction of the court;

1 d. has been substantially diminished in value; or

2 e. has been commingled with other property which cannot be divided  
3 without difficulty,

4 the United States of America shall be entitled to forfeiture of substitute property  
5 pursuant to 21 U.S.C. § 853(p).

6 DATED this \_\_\_\_ day of March 2021.

7 A TRUE BILL

8  
9 \_\_\_\_\_  
10 Foreperson

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12 \_\_\_\_\_  
13 Joseph H. Harrington  
14 Acting United States Attorney

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16 \_\_\_\_\_  
17 Stephanie Van Marter  
18 Assistant United States Attorney  
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